

Exhibit 13

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL)
PRESCRIPTION) MDL No. 2804
OPIATE LITIGATION)
_____) Case No.
) 1:17-MD-2804
)
THIS DOCUMENT RELATES) Hon. Dan A.
TO ALL CASES) Polster

FRIDAY, JUNE 28, 2019

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CONFIDENTIALITY REVIEW

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Videotaped deposition of Ronald
W. Buzzeo, R.Ph., held at the offices of Williams
Mullen, 200 South 10th Street, Suite 1600,
Richmond, Virginia, commencing at 9:08 a.m.,
on the above date, before Carrie A. Campbell,
Registered Diplomat Reporter and Certified
Realtime Reporter.

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| <p>1 BARNES & THORNBURG LLP BY: ALYSSA C. HUGHES 2 ahughes@btlaw.com (VIA TELECONFERENCE) 3 11 South Meridian Street Indianapolis, Indiana 46204-3535 4 (317) 236-1313 Counsel for HD Smith 5 6 BAILEY WYANT PLLC BY: JOHN FULLER 7 jfuller@baileywyant.com (VIA REALTIME STREAM) 8 500 Virginia Street East, Suite 600 Charleston, West Virginia 25301 9 (304) 345-4222 Counsel for West Virginia Board of 10 Pharmacy 11 12 VIDEOGRAPHER: DEVYN MULHOLLAND, 13 Golkow Litigation Services 14 15 --- 16 17 18 19 20 21 22 23 24 25</p> | <p>1 VIDEOGRAPHER: We are now on 2 the record. 3 My name is Devyn Mulholland. 4 I'm a videographer with Golkow 5 Litigation Services. 6 Today's date is June 28, 2019. 7 The time is 9:08 a.m. 8 This video deposition is being 9 held in Richmond, Virginia in the 10 matter of National Prescription Opiate 11 Litigation. 12 The deponent is Ronald Buzzeo. 13 Counsel, please identify 14 yourselves for the record. 15 MR. LOESER: Derek Loeser for 16 the plaintiffs. 17 MR. KAWAMOTO: Dean Kawamoto 18 for the plaintiffs. 19 MR. KO: David Ko, also on 20 behalf of the plaintiffs. 21 MS. CONROY: Jayne Conroy, 22 plaintiffs. 23 MR. LIU: Zhao Liu, O'Melveny & 24 Myers on behalf of Johnson & Johnson 25 and Janssen.</p> |
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| <p>1 INDEX 2 PAGE 3 APPEARANCES..... 2 4 EXAMINATIONS 5 BY MR. LOESER..... 11 6 BY MR. DAVISON..... 455 7 8 EXHIBITS 9 No. Description Page 10 Buzzeo 1 Plaintiffs' Notice of Oral 14 Videotaped Expert Deposition of 11 Ronald Buzzeo 12 Buzzeo 2 Mallinckrodt's Anti-Diversion 15 Program: Selected Highlights 13 14 Buzzeo 3 Ronald Buzzeo invoice 16 15 Buzzeo 4 Expert Report of Ronald W. 69 Buzzeo, R.Ph. May 31, 2019 16 Buzzeo 5 Ronald W. Buzzeo, R.Ph. 72 Curriculum vitae 17 18 19 20 21 22 23 24 25</p> | <p>1 MS. NOWAK: Darlene Nowak, 2 Marcus & Shapira, on behalf of HBC 3 Services. 4 MR. MONTMINY: Brandan Montminy 5 on behalf of Henry Schein defendant. 6 MR. SNAPP: Erik Snapp on 7 behalf of the Purdue defendants. 8 MR. HYNES: Paul Hynes on 9 behalf of CVS, Indiana LLC and CVS RX 10 Services, Inc. 11 MS. WICHT: Jennifer Wicht on 12 behalf of Cardinal Health. 13 MS. VENTURA: Catie Ventura on 14 behalf of the Allergan defendants. 15 MR. O'CONNOR: Andrew O'Connor 16 on behalf of Mallinckrodt LLC and 17 SpecGx. 18 MS. LARUSSA: Cassandra LaRussa 19 on behalf of Mallinckrodt and SpecGx. 20 MR. DAVISON: William Davison 21 on behalf of Mallinckrodt LLC and 22 SpecGx. 23 THE WITNESS: I'm Ron Buzzeo. 24 VIDEOGRAPHER: The court 25 reporter is Carrie Campbell, who will</p> |

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| <p style="text-align: right;">Page 434</p> <p>1 they had a system in place, and they reported 2 suspicious orders. 3 Q. And the system was effective. 4 Does that mean that it reported all of the 5 suspicious orders? 6 A. It means they reported -- 7 MR. DAVISON: Objection. 8 Go ahead. 9 THE WITNESS: It means they 10 reported suspicious orders. 11 QUESTIONS BY MR. LOESER: 12 Q. So maybe they reported some 13 suspicious orders? 14 A. I didn't say that. You said 15 that. 16 MR. DAVISON: Objection. 17 QUESTIONS BY MR. LOESER: 18 Q. Well, is that your opinion? 19 A. My opinion is they reported 20 suspicious orders. 21 Q. So you don't know whether they 22 reported some or all of the orders? 23 MR. DAVISON: Objection. 24 THE WITNESS: I do know, based 25 upon what I said here. I don't know</p> | <p style="text-align: right;">Page 436</p> <p>1 Q. And so, sir, you did not review 2 the actual orders that Mallinckrodt received 3 in this time period; is that correct? 4 A. No, I did -- not the orders. I 5 looked at the process. 6 Q. And, sir, if you look at 7 paragraph 147 of your report, you state, "It 8 is my opinion that Mallinckrodt's suspicious 9 order monitoring system was sufficient and 10 effective to detect and report suspicious 11 orders to DEA from 2012 through 2018." 12 A. Correct. 13 Q. So are you saying, sir, that 14 Mallinckrodt reported all the suspicious 15 orders that it received in that time period? 16 A. Mallinckrodt's suspicious order 17 monitoring system was sufficient to detect -- 18 was effective to detect and report suspicious 19 orders. They reported the suspicious orders 20 that they identified. 21 Q. Did they report all of the 22 orders? 23 MR. DAVISON: Objection. 24 THE WITNESS: They reported 25 every suspicious order.</p> |
| <p style="text-align: right;">Page 435</p> <p>1 what else to say. They reported 2 suspicious orders. 3 QUESTIONS BY MR. LOESER: 4 Q. It seems like a simple 5 question. Did they report all of them or 6 some of them? 7 MR. DAVISON: Objection. He's 8 answered your question. 9 THE WITNESS: It is my opinion 10 that Mallinckrodt's suspicious order 11 monitoring system was sufficient and 12 effective, sufficient and effective, 13 to detect and report suspicious orders 14 to the DEA in the 2010-2011 time 15 period. 16 QUESTIONS BY MR. LOESER: 17 Q. In forming this opinion, did 18 you evaluate the orders received and shipped 19 by Mallinckrodt during this time period? 20 A. I evaluated the documents that 21 you're aware of, the depositions, the 22 operating procedures I looked at, reports I 23 looked at, and I came to my decision that 24 Mallinckrodt's program met the regulatory 25 requirements.</p> | <p style="text-align: right;">Page 437</p> <p>1 QUESTIONS BY MR. LOESER: 2 Q. Okay. And how do you define 3 sufficient? 4 A. Based upon my evaluation, the 5 program was able to detect and report 6 excessive orders. 7 Q. And how do you define 8 effective? 9 A. That they were reporting 10 suspicious orders. 11 Q. And in forming this opinion for 12 the 2012 through 2018 time period, did you 13 review any of the orders that Mallinckrodt 14 actually received and shipped? 15 A. When you're looking at the 16 process and the material, you don't have to 17 actually look at orders. Because looking at 18 an individual order or a thousand orders or 19 something is not really going to tell you 20 whether something is suspicious or not. 21 So you're looking at the 22 process. You have the process in place to 23 look at the orders to make a determination. 24 That's what I looked at. I 25 looked at the regulation. I looked at the</p> |

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| <p>1 guidance letters, industry experience, my</p> <p>2 experience, to make that determination.</p> <p>3 Q. If you could turn to</p> <p>4 paragraph 153 of your report.</p> <p>5 A. 153, yes.</p> <p>6 Q. This is your opinion with</p> <p>7 regard to the McCann and Keller</p> <p>8 methodologies.</p> <p>9 Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. And why don't you take a</p> <p>12 second -- or a minute to review that, and</p> <p>13 I'll ask you a few questions about that</p> <p>14 paragraph.</p> <p>15 A. Yes.</p> <p>16 Q. Have you had a chance to review</p> <p>17 that paragraph?</p> <p>18 A. Yes. Yes. Thank you.</p> <p>19 Q. In paragraph 153, you claim</p> <p>20 that the five methodologies utilized by</p> <p>21 McCann and Keller are pulled from</p> <p>22 Mr. Rafalski's expert report, and no reason</p> <p>23 is given as to why any of these methodologies</p> <p>24 would be appropriate for any particular</p> <p>25 defendant; is that right?</p> | <p>1 QUESTIONS BY MR. LOESER:</p> <p>2 Q. Her question is my question.</p> <p>3 A. Okay. Yeah. I'm saying -- I</p> <p>4 was waiting if you were going to say anything</p> <p>5 else.</p> <p>6 Yes, what I state here.</p> <p>7 Q. And you've read the Rafalski</p> <p>8 report?</p> <p>9 A. Yes.</p> <p>10 Q. Did you read the entire report?</p> <p>11 A. Yes.</p> <p>12 Q. And you read the entire McCann</p> <p>13 report?</p> <p>14 A. Yes.</p> <p>15 Q. And you read the entire Keller</p> <p>16 report?</p> <p>17 A. Yes.</p> <p>18 Q. And you specifically --</p> <p>19 according to the footnotes here, you</p> <p>20 specifically reviewed certain portions of the</p> <p>21 Rafalski report which you identify as -- in</p> <p>22 footnotes 199 and 200; is that correct?</p> <p>23 MR. DAVISON: Objection.</p> <p>24 THE WITNESS: Yeah, I read the</p> <p>25 Rafalski report.</p> |
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| <p>1 A. Correct.</p> <p>2 Q. And you've reviewed each of</p> <p>3 these methodologies in detail?</p> <p>4 A. I reviewed the reports.</p> <p>5 Q. And your testimony is that</p> <p>6 Mr. Rafalski does not identify why it would</p> <p>7 be appropriate to utilize any of these</p> <p>8 methodologies?</p> <p>9 A. Correct.</p> <p>10 Q. You also state in paragraph 154</p> <p>11 that Mr. Rafalski, without any analysis,</p> <p>12 simply adopts the analyses of both Dr. McCann</p> <p>13 and Ms. Keller and contends that each of the</p> <p>14 flagged orders is, in fact, suspicious; is</p> <p>15 that correct?</p> <p>16 A. Where are you? Let me read</p> <p>17 154.</p> <p>18 Q. Okay.</p> <p>19 A. Okay.</p> <p>20 MR. LOESER: So could you read</p> <p>21 the question back, please?</p> <p>22 (Court Reporter read back</p> <p>23 question.)</p> <p>24 THE WITNESS: You want me to</p> <p>25 respond to her question or...</p> | <p>1 QUESTIONS BY MR. LOESER:</p> <p>2 Q. Okay. And so the references to</p> <p>3 page 40 and 41, what are you saying, that you</p> <p>4 in fact read the entire report?</p> <p>5 A. I -- that report I read.</p> <p>6 Q. And is your opinion about the</p> <p>7 Rafalski report based upon pages 40 and 41 of</p> <p>8 his report?</p> <p>9 MR. DAVISON: Objection.</p> <p>10 THE WITNESS: Yes.</p> <p>11 QUESTIONS BY MR. LOESER:</p> <p>12 Q. Okay. Is it based on any other</p> <p>13 part of his report?</p> <p>14 A. I looked at the rest of the</p> <p>15 report. I don't recall now whether I used</p> <p>16 some of that or not, but I did read the</p> <p>17 entire report. And out of that, I pulled out</p> <p>18 what I thought was important.</p> <p>19 Q. And you also cite portions of</p> <p>20 the Keller report and the McCann report; is</p> <p>21 that correct?</p> <p>22 A. Yes.</p> <p>23 Q. And you provide particular page</p> <p>24 citations for the portions that support your</p> <p>25 opinion?</p> |

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